

From: [David Garcia](#)
To: [John Blevins](#)
Cc: [lawrence.starfield@EPA](#); [Richard.Greene](#); [carl.edlund@EPA](#); [David.Gray](#); [Pam.Mazakas](#); [David.Eppler](#); [Esteban.Herrera](#)
Subject: Re: Mtg with ORD and OAQPS on AACM
Date: 01/28/2007 05:11 PM

John and Others,

Re. Site Location for AACM Test 2

While we thought we had the ideal location (Longhorn, located NorthEast Tx)for AACM test 2, David Eppler received a phone call from Dr. Rose Zenzer with the US Army Corps of Enginners saying that ALL the buildings at Longhorn have been demolished except one, that being the powerplant, which is too large and too full of the wrong types of asbestos to be a AACM test 2 candidate.

Therefore the search for test site 2 is still underway.

-----John Blevins/R6/USEPA/US wrote: -----

To: lawrence.starfield@EPA, Greene.Richard@epamail.epa.gov@EPA, carl.edlund@EPA, Gray.David@epamail.epa.gov
From: John Blevins/R6/USEPA/US
Date: 01/24/2007 06:44AM
cc: david.garcia@EPA, Pam.Mazakas/DC/USEPA/US@EPA
Subject: Mtg with ORD and OAQPS on AACM

Richard/Larry- Our (David, David, and myself) meeting in Cincinnati yesterday went well. The discussions went well and everyone was in a cooperative mood. Some important information that I wanted to share with you as I am on the "road" until Tuesday. If we need to have a call to discuss before then let me know.

Sally Gutierrez, ORD, and Penny Lassiter, OAQPS, we in attendance. Penny is a Associate Director for the "shop" in OAQPS that the NESHAP standard resides.

1) Most important, while everyone agrees the ultimate goal of the AACM work is a regulatory change, it is **not** on the radar to happen anytime soon nor is it on the priority list of regulatory actions that OAQPS is working on. In defense of OAQPS they have a significant "backlog" of regulatory changes they need to make (somewhere in the neighborhood of 90) with some if not all of them being court mandated.

2) With this in mind, we did have some good news.

a) the "pilot" study is continuing to move forward and we hope to have the "technical" report ready for release in the April/may timeframe

b) the "pilot" was a great success (lower cost, shorter time, not significant difference in environmental impact)...but the building used for the "pilot" represent a limited subset of the "universe" of asbestos contaminated material that would be subject to demolition under the situations faced by cities and local municipalities

c) with this in mind, all agreed additional testing of the method (which was developed and successful applied in the pilot) was necessary to gather sufficient data to support a rule change that would have significant impact on the ground

d) it was agreed that additional testing was needed for two significant sources of asbestos: 1) transite siding, and 2) popcorn ceiling material

e) efforts are underway to find candidate buildings that have this material for the next stage of testing (not phase 2 but rather test 2 of the method)

f) it was also determined that additional information showing the universe of "buildings" that a rule change could/would apply to would be good information to collect and also the potential cost saving that could/would apply

g) ORD has secured \$350 K for "test 2" and they believe that will be sufficient to conduct the test

h) a conceptual path forward has been charted:

1) move forward with completing the pilot technical report- ORD lead

2) move forward with drafting and completing a "strategy" document that will accompany the technical report that will put the results in context and lay out the future path forward (as we know it today) that leads to a regulation change- R6 lead

3) develop a communication strategy for the public release of the reports- R6 lead

4) focus on a South Texas building (forgot location and can not find my notes) for "test 2"- two story building with transite siding- owned by State Wildlife Agency- confirm in the near future whether the building is available-ORD lead on technical aspects...R6 lead on contact with State and local contacts

5) once confirmed move forward with QAPP and NAA for "test 2"

6) develop milestones and timeline for "test 2"- should be able to complete in 8-12 months once building is confirmed

i) Questions for us to answer:

1) knowing a rule is not on the priority list what if anything do we want to do to try to change that

2) how much priority do we place on participating in "test 2"

3) which part of R6 should be the lead for this work- 6EN or 6PD

4) I found out yesterday that Grant may not know that OECA resources are being used to support this project and may not be in agreement with this use and also that he may not be supportive of a NAA for "test 2" without a stronger commitment on the rule change and tighter schedule

Sorry so cryptic but wanted to get you something...

John

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